To: O'Connor, Darcy[oconnor.darcy@epa.gov]

Cc: Thomas, Deb[thomas.debrah@epa.gov]; Schuller, Jennifer[Schuller.Jennifer@epa.gov]

From: McGrath, Shaun

**Sent:** Fri 2/12/2016 12:09:51 AM

Subject: RE: information on the U&O Ozone exceedances and potential FIP

Excellent. Thanks!

From: O'Connor, Darcy

**Sent:** Thursday, February 11, 2016 4:35 PM **To:** McGrath, Shaun < McGrath. Shaun@epa.gov >

Cc: Thomas, Deb <thomas.debrah@epa.gov>; Schuller, Jennifer <Schuller.Jennifer@epa.gov>

Subject: information on the U&O Ozone exceedances and potential FIP

Shaun, I'm attaching some information for the Administrator's weekend report. It's a bit long, but we wanted to make sure we had some of the background information if needed. If you have questions or need additional information tomorrow, please give Jennifer a holler.

Thanks!

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## **Uinta and Ouray Indian Reservation Proposed Federal Implementation Plan for Existing Oil and Natural Gas Well Production Facilities**

**Air Quality Background:** Ozone levels in the Uinta Basin have exceeded the ozone standard numerous times over the past few years and represent a serious public health concern. Wintertime ozone in the basin has caused the first exceedances in the nation of the new ozone NAAQS in 2016. Six different monitors in the basin have recorded a total of 27 exceedances to date in CY16. Preliminary data, (not yet QA'd or certified) at the Ouray monitor in the basin is currently showing an 8 hour average ozone above 100 ppb, and five additional monitors also have values exceeding the ozone NAAQS with 8 hour averages in the mid 70s to mid 80s. The Ouray monitor has the highest preliminary design value (3 year average of the 4<sup>th</sup> max value of 8

hour average ozone, which is used for comparison to the NAAQS) in the basin for 2014-2016 at 77.7 ppb.

**Oil and Gas Emissions:** Approximately 98 % of VOC and 60 % of NOx emissions released in the Uinta Basin are from existing oil and natural gas production operations under the Clean Air Act. Furthermore, approximately 78 % of oil and natural gas sources are on Indian country lands within the U&O Indian Reservation which are largely unregulated, with no control obligations. The proposed FIP will fill a regulatory gap with regard to controlling VOC emissions from existing sources within the U&O Reservation that are not covered by the proposed national FIP for Indian country.

## Ex. 5 - Deliberative Process